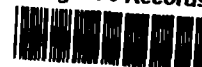




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



243456

REPLY TO ATTENTION OF:

AUG 07 1991

5HS-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Interstate Pollution Control

Dear Sir or Madam:

Enclosed please find a unilateral Administrative Order issued by the U.S. Environmental Protection Agency (EPA) under Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 (CERCLA), 42 U.S.C. Section 9601, et seq.

Please note that the Order allows an opportunity for a conference if requested within seven (7) calendar days after issuance of the Order, or if no conference is requested, an opportunity to submit comments within seven (7) calendar days of receipt of the Order.

If you have any questions regarding the Order, feel free to contact John Breslin, Assistant Regional Counsel, at (312) 886-7165 or Paul Steadman, On-Scene Coordinator, at (312) 353-7615.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "David A. Ullrich".

for David A. Ullrich, Director
Waste Management Division

Enclosure

cc: William Child, Illinois Environmental Protection Agency
Scott Moyer, RPM, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)	Docket No.	V-W- '91 -C- 112
)		
INTERSTATE POLLUTION CONTROL)	ADMINISTRATIVE ORDER	
)	PURSUANT TO SECTION 106	
)	OF THE COMPREHENSIVE	
)	ENVIRONMENTAL RESPONSE,	
Respondents:)	COMPENSATION, AND	
)	LIABILITY ACT OF 1980,	
Listed in Attachment A)	as amended, 42 U.S.C.	
)	Section 9606(a)	
)		

PREAMBLE

This Administrative Order (Order) is issued on this date to Respondents listed in Attachment A.

It is issued pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9606(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 (CERCLA), and delegated to the Administrator of the United States Environmental Protection Agency (U.S. EPA) by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, and further delegated to the Assistant Administrator for Solid Waste and Emergency Response and the Regional Administrators by U.S. EPA Delegation Nos. 14-14-A and 14-14-B, and to the Director, Waste Management Division, Region V, by Regional Delegation 14-14-A and 14-14-B.

By copy of this Order the State of Illinois has been notified of the issuance of this Order as required by Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a).

This Order requires the Respondents to undertake and complete emergency removal activities to abate an imminent and substantial endangerment to the public health and welfare or the environment that may be presented by the actual or threatened release of hazardous substances at the site.

FINDINGS

Based on available information, including the Administrative Record in this matter, U.S. EPA hereby finds:

1. The Interstate Pollution Control site hereinafter referred to as IPC, is located within the City of Rockford, Winnebago County, Illinois. Specifically, IPC is located adjacent to the northwest intersection of Peoples and Magnolia Avenues. The site is bordered on the west by Quaker Avenue (closed factory); on the north by a dirt road and an old quarry pond (Gunitite Pond); on the east by Magnolia Avenue; and on the south by a railroad spur and Peoples Avenue. Specifically, the area for this site comprises the Southeast quarter of Section 34 and the Southwest quarter of the Southwest quarter of Section 35, Township 44 North, Range 1 East. The site encompasses approximately 4.5 acres.

IPC was placed on the National Priorities List (NPL), on June 24, 1988, 53 Fed. Reg. 23997.

2. IPC is a hazardous waste storage facility that was in operation from 1971 to 1984. The facility is currently known as Interstate Pollution Control, and was known as such during most of the time the site was operating.
3. In June of 1971 IPC initiated operations as a waste oil recycler, industrial waste storage facility and hazardous waste transporter. Waste management units include aboveground and underground tanks, drum storage and a surface impoundment. In October of 1971, an incinerator was installed on site to burn cyanide. The incinerator was capable of burning 3,500 gallons of cyanide waste per week.
4. In March of 1979, the National Enforcement Investigations Center (NEIC) collected samples of soils and liquids ponded on-site. Cyanide was detected in every on-site sample. The highest concentration was 14.1 mg/l. Also detected were heavy metals including cadmium, chromium, copper, lead, nickel and zinc; and organic contaminants including isophorone, methylene chloride, 1,1,1-trichloroethane, trichloroethene, 1,2-dichloroethene and methyl isobutyl ketone.
5. IPC commenced a cleanup of the surface impoundment in December of 1979. Liquids were pumped out of the surface impoundment and approximately 180 yards of contaminated soils were removed. The impoundment was subsequently capped. It is unknown if sludges were removed from the bottom of the impoundment prior to the installation of the cap.
6. It has been determined that the local aquifer is contaminated based on a study performed by Ecology & Environment, a U.S. EPA contractor, dated April 30, 1986. The study includes groundwater analysis from three separate sampling events. The Illinois Environmental Protection Agency (IEPA) sampled the on-site groundwater monitoring wells on April 26, 1983, and the Field Investigations Team (FIT) sampled on August 14, 1984 and April 25, 1985.

Contamination of groundwater with the following substances was documented: volatile organics, including but not limited to xylene, benzene, toluene, 1,1,1-trichloroethane, trichloroethene, 1,2-dichloroethane, and chloroform; and cadmium, chromium, lead, zinc, cyanide and nickel.

7. Since the inception of IEPA's manifest system in October of 1979, approximately 5,500,000 gallons of hazardous waste has been documented as having been transported to the site.
8. Soil sampling conducted by the Technical Assistance Team (TAT), a contractor of U.S. EPA, in 1988 indicates that elevated concentrations of cadmium, copper, lead, zinc, cyanide, and volatile organics were present in surface soils.
9. In October of 1989 a site assessment was performed by the TAT. This assessment cited evidence of recent dumping of residential and industrial wastes including stained surface soils. An on-site storage tank was found to contain low flashpoint hazardous liquids (113 degrees Fahrenheit). Samples taken from the surface impoundment indicated elevated levels of cyanide. The soil cap placed on the lagoon in 1979 is deteriorating and hosts residential and construction debris. Access to the site was found to be unrestricted.
10. Laboratory results of the samples taken from seven storage tanks by the Illinois Environmental Protection Agency in November 1989 indicated PCBs (Aroclor 1254) in three out of seven samples collected. Five out of the seven tanks contained ignitable material with flashpoints of less than 130 degrees Fahrenheit. Additionally, the analysis indicated the presence of the following hazardous substances: barium, chromium, lead, zinc, methylene chloride, acetone, 1,1,1-Trichloroethane, trichloroethene, benzene, toluene, ethylbenzene, styrene and xylene.
11. On December 19, 1990, additional samples of the seven tanks were taken by U.S. EPA TAT Ecology & Environment. Hazardous substances including 1,1,1-trichloroethane, benzene, tetrachloroethene, toluene, ethylbenzene, xylene, trans-1,2-dichloroethene, trichloroethene, chlorobenzene, 1,1-dichloroethane, and PCBs were present. Three of the seven tanks were found to contain ignitable materials with a flashpoint of less than or equal to 140 degrees Fahrenheit.

DETERMINATIONS

U.S. EPA has determined that:

1. Interstate Pollution Control is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9).
2. Each Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

3. The Respondents listed in Attachment A arranged for disposal or transport for disposal of hazardous substances at the IPC facility, except for IPC and Anderson's Garage, which are, respectively, the present operator and owner of the facility. The Respondents are therefore liable persons under Section 107(a) of CERCLA, 42 U.S.C. Section 9607.

4. Cyanide and low flashpoint liquids, including but not limited to toluene, xylene, and benzene, are "hazardous substances" as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14).

5. The presence of hazardous substances in the soils constitutes an actual "release," and the presence of hazardous substances in tanks without adequate environmental controls constitutes a threatened "release," as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22).

6. The actual or threatened release of hazardous substances from the Facility may present an imminent and substantial endangerment to the public health, welfare, or the environment.

7. The actions required by this Order, if properly performed, are consistent with the National Contingency Plan (NCP), 40 CFR 300.415(b)(2), as amended, and CERCLA; and are reasonable and necessary to protect the public health, welfare and the environment because of the following factors:

- a. **actual or potential exposure to hazardous substances by nearby populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

This factor is present at the facility due to the accessibility of the site to the public and wildlife, and due to the existence of high quantities of flammable and hazardous substances stored on site within a system of underground and aboveground storage tanks with inadequate containment mechanisms. Also present are heavily contaminated surface soils which form the cap for the former unlined surface impoundment.

- b. **actual and potential further contamination of drinking water supplies or sensitive ecosystems;**

This factor is present at the facility due to the existence of contaminants, including volatile organics, cyanide and mercury deposited in the unlined surface impoundment; and potentially leaking underground and aboveground storage tanks containing ignitable hazardous substances which create a substantial endangerment to groundwater supplies in the region.

- c. **hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

This factor is present at the facility due to the existence of at least six underground storage tanks (USTs) and one aboveground storage tank containing highly ignitable substances, volatile compounds and oily sludges in a total estimated quantity of 220,000 gallons.

- d. **high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;**

This factor is present at the facility due to the existence of eroded unstabilized soil conditions over the surface of the surface impoundment in the north, northeast and central area of this facility which analytical results showed to contain elevated levels of cyanide, cadmium, chromium, lead and zinc.

- e. **weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;**

This factor is present at the facility due to the existence of exposed surface conditions at and within the surface impoundment area on the central north, northeast portion of this facility which may migrate off-site as a result of major precipitation.

- f. **threat of fire or explosion;**

This factor is present at the facility due to low flashpoint liquid or semi-liquid substances showing ignitability characteristics of 140 degrees Fahrenheit (or less) in above and underground storage tanks or vessels. A fire or explosion would also result in off-site transport of hazardous particulate matter to adjacent uncontaminated areas.

- g. **other situations or factors which may pose threats to public health or welfare or the environment.**

This factor is present at the facility due to the lack of site access controls, unsecured entry to structures where flammable substances are stored, and unsecured entryway covers to USTs posing a significant potential endangerment to persons who might inadvertently enter the site area.

ORDER

Based upon the foregoing Findings and Determinations, and pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), it is hereby Ordered that Respondents undertake the following actions at the Facility:

1. Within fourteen (14) calendar days after the effective date of this Order, the Respondents shall submit to U.S. EPA for approval, a Work Plan for the removal activities ordered as set forth in Paragraph 4 below. The Work Plan shall provide a concise description of the activities to be conducted to comply with the requirements of this Order. The Work Plan shall be reviewed

by U.S. EPA, which may approve, disapprove, require revisions, or modify the Work Plan. In the event that U.S. EPA requests revisions to the workplan, Respondents shall submit a revised Work Plan that corrects noted deficiencies within seven (7) calendar days of receipt of U.S. EPA's request for revisions. Respondents shall implement the Work Plan as finally approved by U.S. EPA. Once approved, the Work Plan shall be deemed to be incorporated into and made a fully enforceable part of this Order.

2. The Work Plan shall contain a site safety and health plan, a sampling and analysis plan, and a schedule of the work to be performed. The site safety and health plan shall be prepared in accordance with the Occupational Safety and Health Administration (OSHA) regulations applicable to Hazardous Waste Operations and Emergency Response, 29 CFR Part 1910. The Work Plan and other submitted documents shall demonstrate that the Respondent can properly conduct the actions required by this Order.

3. Respondents shall retain a contractor qualified to undertake and complete the requirements of this Order, and shall notify U.S. EPA of the name of such contractor within five (5) business days of the effective date of this Order. U.S. EPA retains the right to disapprove of any, or all, of the contractors and/or subcontractors retained by the Respondents. In the event U.S. EPA disapproves of a selected contractor, Respondents shall retain a different contractor to perform the work, and such selection shall be made within two (2) business days following U.S. EPA's disapproval.

4. Within ten (10) calendar days after U.S. EPA approval of the Work Plan, the Respondents shall erect a six-foot high chain link fence with three strands of barbed wire around the entire perimeter of the site.

5. Within fourteen (14) calendar days after U.S. EPA approval of the Work Plan, Respondents shall implement the Work Plan as approved or modified by U.S. EPA, except as described above in paragraph 4. Failure of the Respondents to properly implement all aspects of the Work Plan shall be deemed to be a violation of the terms of this Order. The Work Plan shall require the Respondents to perform, and complete within sixty (60) calendar days after approval, at a minimum, the following removal activities:

- a. Repair the cap over the surface impoundment to reduce off-site migration of contaminants.
- b. Remove the hazardous and non-hazardous substances being stored in the aboveground and underground tanks.
- c. Remove the aboveground and underground tanks and any adjacent soil visibly contaminated by leakage from such tanks.

6. All materials containing hazardous substances, pollutants or contaminants removed pursuant to this Order shall be disposed of or treated at a facility approved by the On-Scene Coordinator and in accordance with the Resource Conservation and Recovery Act of 1976 (RCRA), 42 U.S.C. Section 6901, et seq., as amended, the U.S. EPA Revised Off-Site Policy, and all other applicable Federal, State, and local requirements.

7. On or before the effective date of this Order, the Respondents shall designate a Project Coordinator. To the greatest extent possible, the Project Coordinator shall be present on site or readily available during site work. The U.S. EPA has designated Paul Steadman of the Emergency and Enforcement Response Branch, Response Section II, as its On-Scene Coordinator. The On-Scene Coordinator and the Project Coordinator shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communication between the Respondents and the U.S. EPA, and all documents, reports and approvals, and all other correspondence concerning the activities relevant to this Order, shall be directed through the On-Scene Coordinator and the Project Coordinator.

8. The U.S. EPA and the Respondents shall each have the right to change their respective designated On-Scene Coordinator or Project Coordinator. U.S. EPA shall notify the Respondents, and Respondents shall notify U.S. EPA, as early as possible before such a change is made, but in no case less than 24 hours before such a change. Notification may initially be verbal, but shall promptly be reduced to writing.

9. The U.S. EPA On-Scene Coordinator shall have the authority vested in an On-Scene Coordinator by the NCP, 40 CFR Part 300, as amended, including the authority to halt, conduct, or direct any work required by this Order, or to direct any other response action undertaken by U.S. EPA or the Respondents at the facility.

10. No extensions to the above time frames shall be granted without sufficient cause. All extensions must be requested, in writing, and shall not be deemed accepted unless approved, in writing, by U.S. EPA.

11. This Order and all instructions by the U.S. EPA On-Scene Coordinator or his designated alternate that are consistent with the National Contingency Plan and this Order shall be binding upon the Respondents.

12. To the extent that the Facility or other areas where work under this Order is to be performed is owned by, or in possession of, someone other than the Respondents, Respondents shall obtain all necessary access agreements. In the event that after using their best efforts Respondents are unable to obtain such agreements, Respondents shall immediately notify U.S. EPA. U.S. EPA may then assist Respondents in gaining access, to the extent necessary to effectuate the response activities described herein, using such means as it deems appropriate.

13. Respondents shall provide access to the Facility to U.S. EPA employees, contractors, agents, and consultants at reasonable times, and shall permit such persons to be present and move freely in the area in order to conduct inspections, including taking photographs and videotapes of the Facility, to do cleanup/stabilization work, to take samples to monitor the work under this Order, and to conduct other activities which the U.S. EPA determines to be necessary.

14. Nothing contained herein shall be construed to prevent U.S. EPA from seeking legal or equitable relief to enforce the terms of this Order, or from taking other legal or equitable action as it deems appropriate and necessary, or from requiring the Respondents in the future to perform additional activities pursuant to CERCLA, 42 U.S.C. Section 9601 et seq., or any other applicable law.

15. This Order shall be effective seven (7) calendar days following issuance unless a conference is requested as provided herein. If a conference is requested, this Order shall be effective on the third (3rd) calendar day following the day of the conference unless modified in writing by U.S. EPA.

16. On or before three (3) calendar days from the effective date of this Order, Respondents shall provide notice, verbally or in writing, to U.S. EPA stating their intention to comply with the terms of this Order. Verbal notification must be followed in writing within seven (7) calendar days. In the event any Respondents fail to provide such notice, those Respondents shall be deemed not to have complied with the terms of this Order.

17. Copies of all records and files relating to hazardous substances found on the site shall be retained for six years following completion of the activities required by this Order and shall be made available to the U.S. EPA prior to the termination of the removal activities under this Order.

18. Respondents shall provide a written monthly progress report to the On-Scene Coordinator regarding the actions and activities undertaken under this Order. At a minimum, these progress reports shall describe the actions that have been taken to comply with this Order, including all results of sampling and tests received or prepared by the Respondents and shall describe all significant work items planned for the next month.

19. The Respondents shall submit a final report summarizing the actions taken to comply with this Order. The report shall contain, at a minimum: identification of the facility, a description of the locations and types of hazardous substances encountered at the facility upon the initiation of work performed under this Order, a chronology and description of the actions performed (including both the organization and implementation of response activities), a listing of the resources committed to perform the work under this Order (including financial, personnel, mechanical and technological resources), identification of all items that affected the actions performed under the Order and discussion of how all problems were resolved, a listing of quantities and types of materials removed, a discussion of removal and disposal options considered for those materials, a listing of the ultimate destination of those materials, and a presentation of the analytical results of all sampling and analyses performed and accompanying appendices containing all relevant paperwork accrued during the action (e.g., manifests, invoices, bills, contracts, permits). The final report shall also include an affidavit from a person who supervised or directed the preparation of that report. The affidavit shall certify under penalty of law that based on personal knowledge and appropriate inquiries of all other persons involved in preparation of the report, the information submitted is true, accurate and complete to the best of the affiant's knowledge and belief.

The report shall be submitted within thirty (30) calendar days of completion of the work required by the U.S. EPA.

20. All notices, reports and requests for extensions submitted under terms of this Order shall be sent by certified mail, return receipt requested, and addressed to the following:

one copy

Paul Steadman
On-Scene Coordinator
Response Section II
U.S. EPA (5HS-12)
230 South Dearborn
Chicago, Illinois 60604

one copy

John Breslin
Assistant Regional Counsel
U.S. EPA (5CS-TUB-7)
230 South Dearborn Street
Chicago, Illinois 60604

21. If any provision of this Order is deemed invalid or unenforceable, the balance of this Order shall remain in full force and effect.

ACCESS TO ADMINISTRATIVE RECORD

The Administrative Record supporting the above Determinations and Findings is available for review on normal business days between the hours of 9:00 a.m. and 5:00 p.m. in the Office of Regional Counsel, United States Environmental Protection Agency, Region V, 111 W. Jackson Blvd., Third Floor, Chicago, Illinois. Please contact John Breslin, Assistant Regional Counsel, at (312) 886-7165 to review the Administrative Record. An index of the Administrative Record is attached hereto.

OPPORTUNITY TO CONFER

With respect to the actions required above, Respondents may within seven (7) calendar days after issuance of this Order, request a conference with the U.S. EPA. Any such conference shall be held within fourteen (14) calendar days from the date of request unless extended by mutual agreement of the parties. At any conference held pursuant to the request, Respondents may appear in person, or be represented by an attorney or other representative. If any Respondent desires such a conference, the Respondent shall contact John Breslin, Assistant Regional Counsel, at (312) 886-7165.

If such a conference is held, Respondents may present any evidence, arguments or comments regarding this Order, its applicability, any factual determinations upon which the Order is based, the appropriateness of any action which Respondents are ordered to take, or any other relevant and material issue. Any such evidence, arguments or comments should be reduced to writing and submitted to U.S. EPA within seven (7) calendar days following the conference. If no conference is requested, any such evidence, arguments or comments must be submitted in writing within seven (7) calendar days following the receipt of this Order. Any such writing should be directed to John Breslin, Assistant Regional Counsel, at the address cited above.

Respondents are hereby placed on notice that U.S. EPA will take any action which may be necessary in the opinion of U.S. EPA for the protection of public health and welfare and the environment, and Respondent(s) may be liable under Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a), for the costs of those government actions.

PENALTIES FOR NONCOMPLIANCE

Respondents are advised pursuant to Section 106(b) (1) of CERCLA, 42 U.S.C. Section 9606(b) (1), that willful violation or subsequent failure or refusal to comply with this Order, or any portion thereof, may subject the Respondents to a civil penalty of no more than \$25,000 per day for each day in which such violation occurs, or such failure to comply continues. Failure to comply with this Order, or any portion thereof, without sufficient cause may also subject the Respondents to liability for punitive damages in an amount three times the amount of any cost incurred by the government as a result of the failure of Respondents to take proper action, pursuant to Section 107(c) (3) of CERCLA, 42 U.S.C. Section 9607(c) (3).

By: 

for David A. Ullrich, Director
Waste Management Division
United States Environmental
Protection Agency
Region V

8/16, 1991

ATTACHMENT A

Amerock Corporation
Attn: Larry Swacina
4000 Auburn Street
P.O. Box 7018
Rockford, Illinois 61125-7018

Anderson's Garage
c/o Laverne Anderson
724 Broadway
Rockford, Illinois 61104

Barber-Coleman Company
Attn: Robert M. Hammes
555 Coleman Center Drive
P.O. Box 7040
Rockford, Illinois 61125-7040

Berol Company
2415 Kishwaukee
Rockford, Illinois 61104

Camcar Sems
c/o Patricia A. Iezzi
McHale, Cook & Welch
1100 Chamber of Commerce Building
320 North Meridian Street
Indianapolis, Indiana 46204

Coltec Industries, Inc.
c/o Mark L. Manewitz
430 Park Avenue
New York, New York 10022

Eclipse, Inc.
Attn: Rick Gregory
1665 Elmwood Road
Rockford, Illinois 61103

Elco Industries
Attn: Bruce Edwards
1111 Samuelson Road
P.O. Box 7009
Rockford, Illinois 61125

Gates Rubber Company
Attn: Merry Ann Vernon
990 South Broadway
Denver, Colorado 80209

Greenlee Tool Company
c/o Patricia A. Iezzi
McHale, Cook & Welch
1100 Chamber of Commerce Building

320 North Meridian Street
Indianapolis, Indiana 46204

Interstate Pollution Control
c/o Donald L. Shriver
Suite 701
401 West State Street
Rockford, Illinois 61101-1296

J.L. Clark Manufacturing Company
2300 South 6th Street
Rockford, Illinois 61104

Mattison Machine Working
1303 Harrison Avenue
Rockford, Illinois 61108

Sundstrand Aviation
c/o Linda S. Aylward
4949 Harrison Avenue
P.O. Box 7003
Rockford, Illinois 61125-7003

Woodward Governor Company
Attn: Linda Baehr
5001 North Second Street
Rockford, Illinois 61125-7001

ADMINISTRATIVE RECORD
FOR
INTERSTATE POLLUTION CONTROL

July 13, 1990

DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
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1/29/90	Bernard Schorle	Jack Barnette	Sample results	13
1/12/90	Bernard Schorle	L. Zintak	Analytical results	62
12/20/89	Suburban Labs	Weston	Analytical results	17
10/13/89	Weston	D. Heaton	Site review	7
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UPDATE

July 16, 1991

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01/10/90	Schorle, B., U.S. EPA	Moyer, S., IEPA	Conversation Record	1
04/25/90	Matz, S., Doyle, W., Weston	Heaton, D., U.S. EPA	Cost Projection	5
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09/27/90	Wanner, B., NET, Inc.	Steadman, P., U.S. EPA	Analytical Report, Sample Nos. 79394- 79400	29
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03/26/91	Davis, W., E & E	Heaton, D., U.S. EPA	Site Activity Report	45
04/08/91	Bowden, R., U.S. EPA	Janssen, J., IEPA	Correspondence Re- garding Admini- strative Order for Removal Action	2
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05/24/91	Williams, R., Golder Assoc. Inc.	Steadman, P., Moyer, S., U.S. EPA & IEPA	Technical Memorandum, Final	180
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00/00/00			Unilateral Admini- strative Order	

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INTERSTATE POLLUTION CONTROL
Rockford, Illinois
LIABILITY FILE INDEX
Sorted by PRP Name and Document Date

<u>Document Date</u>	<u>Document Type</u>	<u>Document Description</u>	<u>Author</u>	<u>Recipient</u>	<u>Total Pages</u>	<u>Document Number</u>
** PRP Name: Amerock						
03/12/79	Correspondence	Letter re: opportunity for Interstate Pollution Control, Inc., to haul and dispose of Amerock's industrial waste. February 7, 1979 letter and hazardous waste manifests attached.	W. Skoglund, Interstate Pollution Control	R. Julin, Amerock Corporation	12	1
** PRP Name: Barber-Coleman						
04/07/77	Memorandum	Memorandum summarizing a meeting between B.Wengrow, IEPA, and C.Kullberg, IPC, during which the disposition of concentrated cyanide wastes was discussed and including a list of companies from which IPC picked up cyanide wastes.	Bob Wengrow, IEPA	Division File	3	2
** PRP Name: Berol Co.						
09/15/80	Manifest	Waste Hauling Manifest	Berol Co.		1	3
** PRP Name: Camcar						
06/28/80	Other	IEPA Division of Land/Noise Pollution Control Special Waste Disposal Application	Interstate Pollution Control		4	4
06/22/90	Correspondence	CERCLA 104(e) Information Request Response	Richard Parrott, Vice President Administration	Ruth Mancos, U.S. EPA	13	5
** PRP Name: Coltec Holdings, Inc.						
00/00/00	Correspondence	CERCLA 104(e) Information Request Response	Coltec Holdings, Inc.	U.S. EPA	7	6
12/18/72	Accounting Documents	IPC Accounting Documents for Colt Industries	IPC		7	7
04/07/77	Memorandum	Memorandum summarizing a meeting between B.Wengrow, IEPA, and C.Kullberg, IPC, during which the disposition of concentrated cyanide wastes was discussed and including a	Bob Wengrow, IEPA	Division File	3	8

INTERSTATE POLLUTION CONTROL
Rockford, Illinois
LIABILITY FILE INDEX
Sorted by PRP Name and Document Date

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		list of companies from which IPC picked up cyanide wastes.				
** PRP Name: Eclipse, Inc.						
09/07/82	Correspondence	Letter stating that a high amount of chromium was found during a spot check of Eclipse's waste oil, and IPC is not allowed to accept high concentrations of that type of waste. Waste Hauling Manifests attached.	B. Skoglund, IPC	Eclipse, Inc.	17	9
** PRP Name: Elco Industries						
04/07/77	Memorandum	Memorandum summarizing a meeting between B.Wengrow, IEPA, and C.Kullberg, IPC, during which the disposition of concentrated cyanide wastes was discussed and including a list of companies from which IPC picked up cyanide wastes.	Bob Wengrow, IEPA	Division File	3	10
07/07/80	Accounting Documents	Receiving Reports/Purchase Orders	IPC		3	11
03/30/84	Reports	Analytical report for waste oil tanks	aqualab, inc.	Warren Larson, Elco Industries	1	12
07/10/84	Memorandum	Memorandum re: concentrated cyanide solutions shipped to CCC in Kansas City. Summary of documents on file is given.	Lloyd Ward, Elco Industries	Jack Packard, Elco Industries/Frank Fiorenza, Elco Industries/ Mike Garvey, Baker & McKenzie	1	13
01/18/85	Reports	Analytical report for waste oil tanks	aqualab, inc.	Jim Wazilak, Elco Industries	1	14
06/06/90	Correspondence	CERCLA 104(e) Information Request Response	Bruce Edwards, Elco Industries	Ruth Mancos, U.S. EPA	4	15
07/31/90	Correspondence	Response to General Notice Letter, expressing willingness to work cooperatively with EPA, without admitting or	Elizabeth Lewis, Baker & McKenzie Attorneys at Law, on behalf of Elco Industries	Carol Graszer, U.S. EPA	2	16

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		denying any liability				
** PRP Name: Gates Rubber Company						
08/27/80	Other	IEPA Division of Land Pollution Control Special Waste Hauling Manifest	Gates Rubber Company		1	17
03/09/81	Other	IEPA Division of Land Pollution Control Special Waste Hauling Manifest	Gates Rubber Company		1	18
07/27/81	Other	IEPA Division of Land Pollution Control Special Waste Hauling Manifest	Gates Rubber Company		1	19
12/19/90	Correspondence	Revised CERCLA 104(e) Information Request Response. Revision sent because an evaluation of waste oil at Gates Rubber Co.'s Rockford, IL, facility indicated that the material may be classified as hazardous due to the presence of lead.	E.Karger, Mgr. Personnel, Environment and Property Protection	Ruth Mancos, U.S. EPA	5	20
* PRP Name: Greenlee Tool Company						
06/22/90	Correspondence	CERCLA 104(e) Information Request Response	C. Burtner, Vice President Administration, Greenlee Textron, Inc.	Ruth Mancos, U.S. EPA	15	21
** PRP Name: Greenlee Tool Company						
05/22/80	Other	IEPA Division of Land Pollution Control Special Waste Hauling Manifest	Greenlee Bros.		1	22
06/09/80	Other	IEPA Division of Land Pollution Control Special Waste Hauling Manifest	Greenlee Bros.		1	23
09/29/80	Other	IEPA Division of Land Pollution Control Special Waste Hauling Manifest	Greenlee Bros.		1	24
02/09/81	Other	IEPA Division of Land	Greenlee Bros.		1	25

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		Pollution Control Special Waste Hauling Manifest				
** PRP Name: Interstate Pollution Control						
06/05/90	Other	Dun & Bradstreet Report indicating that IPC is the site operator	Dun & Bradstreet		2	26
Name: J.L. Clark						
07/11/79	Memorandum	Internal Memorandum re: disposal of Vapo-Blast sediment, stating that waste sample is needed to procure the necessary EPA permit, and problems might exist with regard to heavy metals and redirecting the discharge hookup	J.L. Clark personnel	J.L. Clark personnel	2	27
06/25/80	Other	Waste Water Analysis Form, with attachments: correspondence dated 9/29/81 re: wastewater sludge, and US Ecology approved Request for Disposal Form	J.L. Clark/US Ecology		8	28
04/22/80	Other	Disposal Request for Special and/or Hazardous Waste	Generator: J.L. Clark Transporter: IPC		1	29
03/18/81	Other	IEPA Division of Land Pollution Control Special Waste Hauling Manifest	J.L. Clark (generator)		1	30
06/14/90	Correspondence	CERCLA 104(e) Information Request Response	C.Lake, McBride Baker & Coles, on behalf of J.L. Clark Manufacturing Company	Ruth Mancos, U.S. EPA	3	31
** PRP Name: Mattison Machine						
12/08/80	Other	Various IEPA Division of Land Pollution Control Special Waste Hauling Manifests (dated 12/8/80, 4/17/80, 1/27/80, 1/20/84, and 12/18/79)	Mattison Machine (generator)		5	32

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** PRP Name: Sundstrand Aviation						
06/28/90	Correspondence	CERCLA 104(e) Information Request Response with attachments (summary of inter-state pollution control activity-materials treated/recycled) to supplement response dated 6/11/90	T. McOutcheon, Sundstrand Corporation	Ruth Mancos, U.S. EPA	5	33
** PRP Name: Woodward Governor						
04/07/77	Memorandum	Memorandum summarizing a meeting between B.Wengrow, IEPA, and C.Kullberg, IPC, during which the disposition of concentrated cyanide wastes was discussed and including a list of companies from which IPC picked up cyanide wastes.	Bob Wengrow, IEPA	Division File	3	34

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**PRP Name: Anderson's Garage

02/19/90	Title Search	Title Search indicates that IPC property is owned by Anderson's Garage	PRC Enviro- nmental	Ruth Mancos U.S. EPA	28	35
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